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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Parker, Arizona)

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)
)
)
)
)

MM Docket No. 01-69
RM-10081

TO: John A. Karousos, Chief
Allocations Branch, Policy and Rules Division

REPLY COMMENTS

1. Farmworker Educational Radio Network, Inc.
("Farmworker") hereby amends its Counterproposal in the above-
captioned proceeding as set forth in the accompanying Engineering
Statement, which revises the reference point for the proposed
channel allotment to Searchlight, Nevada.

Respectfully submitted,

Anne Thomas Paxson

/s/ Anne Thomas Paxson
Anne Thomas Paxson

Borsari & Paxson
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Counsel for Farmworker Educational
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May 22, 2001

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ENGINEERING EXHIBIT EE-RM:

**COUNTERPROPOSAL - MM DOC 01-69
REPLY COMMENTS**

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**SUBSTITUTION OF CH. 248B1 FOR 230C3 AT PARKER, AZ
ALLOTMENT OF CH. 239C3 IN LIEU OF 247C3 AT PARKER, AZ
SUBSTITUTION OF CH. 276B1 FOR 235B1 AT BAKER, CA
SUBSTITUTION OF CH. 232C1 FOR 233C1 AT CALIENTE, CA
SUBSTITUTION OF CH. 230C FOR 231C AT HENDERSON, NZ
ALLOTMENT OF CH. 234C0 AT SEARCHLIGHT, NV**

MAY 21, 2001

Prepared on behalf of

Farmworker Educational Radio Network, Inc.

MULLANEY ENGINEERING, INC.**ENGINEERING EXHIBIT EE-RM:****COUNTERPROPOSAL - MM DOC 01-69
REPLY COMMENTS****RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS****TABLE OF CONTENTS:**

1. Declaration of Engineer
2. Narrative Statement
3. Figure 1, Channel Allocation Study for Ch. 248B1 - Farmworker
From Special Ref. Point for Parker, AZ.
4. Figure 2, Channel Allocation Study for Ch. 239C3 - RM
From City Ref. Point for Parker, AZ.
5. Figure 3, Channel Allocation Study for Ch. 276B1 - KKBK
From CP Ref. Point for Baker, CA.
6. Figure 4, Channel Allocation Study for Ch. 274C - KSTJ.
From Special Ref. Point for Boulder City, AZ.
7. Figure 5, Channel Allocation Study for Ch. 232C1 - VAC.
From Allotment Ref. Point for Caliente, NV.
8. Figure 6, Channel Allocation Study for Ch. 230C - KMXB.
From License Ref. Point for Henderson, NV.
9. Figure 7, Channel Allocation Study for Ch. 234C0 - KFLG.
(REV) From City Ref. Point for Searchlight, NV.

Figure 7, revised 5/21/01

MULLANEY ENGINEERING, INC.**Declaration**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested to prepare the instant engineering exhibit in support of a counter proposal in MM Docket 01-69 regarding the allotment of a new FM channel to Parker, Arizona.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

Executed on the 21st day of May 2001

MULLANEY ENGINEERING, INC.**ENGINEERING EXHIBIT EE-RM:****COUNTERPROPOSAL - MM DOC 01-69
REPLY COMMENTS****RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

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SUBSTITUTION OF CH. 230C FOR 231C AT HENDERSON, NZ
ALLOTMENT OF CH. 234C0 AT SEARCHLIGHT, NV**

NARRATIVE STATEMENT:

This amended engineering statement has been prepared in support of a counter proposal in MM Docket 01-69 which proposes the allotment of Channel 247C3 at Parker, Arizona. The purpose of this statement is to slightly revised the proposed coordinates for the allotment of Ch. 234C0 at Searchlight, NV, for use by KFLG.

Technical Proposal

Figure 7 (rev) - Ch. 234C0 now uses the city reference point for Searchlight, NV (City: 35-27-55 / 114-55-08). With the changes previously requested no short spacing will be created.

Counterproposal - MM Doc 01-69
Allotment of Ch. 247C3 to Parker, AZ
May 21, 2001

MULLANEY ENGINEERING, INC.

Summary

Farmworker Educational Radio Network, Inc., believes that the proposed changes to the table of allotments as amended herein will result in a preferential arrangement of allotments and therefore, serves the public interest. If granted, Farmworker will quickly file an CP application for operation on 248B1 and will see that other licensees similarly file as needed.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

May 21, 2001.

***** FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 21-MAY-01 16:36:57 *****
 ***** LAST UPDATE: 010506 *****

KFLG	234 C0	FR	POLARIZATION	ERP (KW)	HAAT	RCMSL
SEARCHLIGHT NV	US			HOR PLN	BM TILT	(METER)
35.2755	114.5508 (D.MMSS)	94.7 MHz	HORIZONTAL	100.000	0.000	450.0
			VERTICAL	100.000	0.000	450.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 450.0 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
CO CHANNEL (40.0)	187.1	0.0	432.7	1419.7	58.1 82.2
1ST ADJACENT (54.0)	124.0	45.0	451.7	1481.8	59.2 83.5
2ND ADJACENT (80.0)	42.6	90.0	708.8	2325.3	71.7 96.0
3RD ADJACENT (100.0)	12.1	135.0	525.0	1722.3	63.8 88.2
		180.0	557.9	1830.5	65.8 90.0
		225.0	398.6	1307.6	56.2 79.7
PROTECTED (60.0)	83.4	270.0	285.9	938.0	49.1 71.3
		315.0	239.5	785.7	45.9 67.4
CITY GRADE (70.0)	59.1				
		AVERAGE	450.0	1476.4	59.1 83.4

FROM CITY REFERENCE POINT

SEARCHLIGHT, NV

EST SITE ELEVATION : 1095.4 m.; 3593.8 ft.
 EST RAD CENTER AGL : 382.3 m.; 1254.3 ft.
 RAD CENTER A.M.S.L.: 1477.7 m.; 4848.1 ft.

THE MEXICAN BORDER IS 305.3 KM ON A BEARING OF 176.5 DEG. TRUE

AZIMUTH	FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG	REL CHN	ERP (KW)	HAAT D	IR	IC	REZLT
											HORZ VERT	(M) A	DIST (KM)	RSEP (KM)	IR IC (KM)
352.5	172.5	KMXB	LIC		BLH951120KF	HENDERSON NV	A	36.0026	115.0024	3RD 231C	100H 100V	369	OK	60.7	105.
352.6	172.6	KMXB	CP		BPH991005AB	HENDERSON NV	A	36.0030	115.0020	3RD 231C	100B 100B	354	OK	60.8	105.
8.5	188.7		VAC			CALIENTE NV	A	37.3654	114.3048	1ST 233C1	H V			241.3	196.
218.3	37.5	KLOB	LIC		BLH001020AB	THOUSAND CA	A	33.5156	116.2558	CO 234A	1.65H1.65V	195D		225.3	215.
245.2	63.4	KTWV	LIC		BLH960718KC	LOS ANGEL CA	A	34.1329	118.0347	CO 234B	58B 58B	863		318.8	272.
112.5	293.1	KFLG-F	LIC		BLH870511KB	KINGMAN AZ	A	35.0640	113.5308	CO 234C	46H 46V	760		101.9	281.
133.6	313.9	KFLG-F	CP		DPH990714IL	KINGMAN AZ	A	35.0158	114.2157	CO 234C1	17H 17V	571E		69.5	259.
268.3	87.7	KKBK	CP		BPH971107MS	BAKER CA	A	35.2610	115.5525	1ST 235B1	1H 1V	399E	OK	91.3	180.
309.3	128.6	KNYE	CP		BPH951102MD	PAHRUMP NV	A	36.1152	116.0208	2ND 236A	6H 6V	-58		129.6	86.
309.3	128.6	KNYE	APP		BMPH010319AB	PAHRUMP NV	A	36.1152	116.0208	2ND 236A	6B 6B	-27		129.6	86.
4.8	184.8	KSTJ	LIC		BLH890306KB	BOULDER C NV	A	35.5945	114.5151	IF 288C2	3.7H 3.7V	484D	TO 274C	59.1	31.

THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

NOTE: KMBX BEING MOVED TO CH. 230C AT LIC SITE
 CALIENTE BEING MOVED TO CH. 232C1 AT REF SITE
 KKBK BEING MOVED TO CH. 275B1 AT CP SITE

**CHANNEL ALLOCATION STUDY FOR CH. 234C0 -
 KFLG. FROM CITY REF. POINT FOR
 SEACHLIGHT, NV.**

COUNTERPROPOSAL - MM DOC 01 - 69

**MULLANEY ENGINEERING, INC.
 GAITHERSBURG, MARYLAND**

**FIGURE 7 (REV)
 MAY 2001**

CERTIFICATE OF SERVICE

I, J. Martin Tansey, hereby certify that on this 22nd day of May, 2001, I caused copies of the foregoing "Reply Comments" to be placed in the U.S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following persons:

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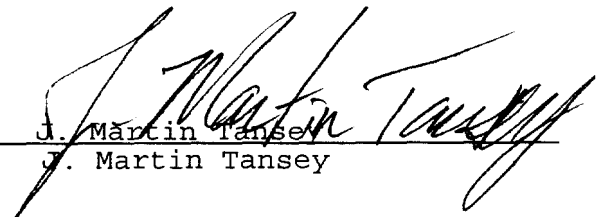
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